



U.S. Department of Justice

United States Attorney  
Eastern District of New York

MRM  
F. #2001R02268

610 Federal Plaza  
Central Islip, New York 11722

February 20, 2020

By Hand and ECF

Honorable Joanna Seybert  
United States District Judge  
United States District Court  
Eastern District of New York  
1030 Federal Plaza  
Central Islip, New York 11722

Re: United States v. Storage Room Numbers, et al.  
Criminal No. 01-MJ-1728 (JS)

Dear Judge Seybert:

The government writes to request an extension of the government's time to respond to the unsealing motion filed by Khalid Awan ("Awan"), regarding above-captioned matter, which is presently due on February 28, 2020. The government requires additional time to obtain necessary documents and complete its response to Awan's motion. The government has not made a prior request for an extension of time.

The sealed search warrant which Awan's motion seeks to unseal was originally issued and sealed in the fall of 2001, almost two decades ago. The related criminal prosecution of Awan, which occurred before the Court, was completed in 2006. See United States v. Hussain, et al., 10-CR-1328 (JS). In that matter, Awan pled guilty to a superseding information charging Awan with Access Device Fraud. This Court sentenced Awan to 60 months' imprisonment. Thereafter, Awan was prosecuted and convicted of, *inter alia*, Providing Material Support to Terrorism and was subsequently sentenced to a term of imprisonment of 168 months. See United States v. Awan, 06-CR-154 (ARR). Indeed, due to the age of the document which Awan seeks to unseal, the government will need to request the closed prosecution files from an off-site location in order to review a copy of the warrant. This process may take several weeks. Accordingly, the government is seeking an adjournment to allow for time to obtain and review a copy of the warrant.

Further, the government respectfully requests that the Court order that the clerk's office provide a copy of the sealed warrant to the government. This may allow the government to obtain a copy of the warrant more quickly.

Accordingly, because the requested relief does not prejudice Awan in any way and will allow the government to expeditiously review the warrant and prepare its response to Awan's motion, the government respectfully requests an additional 90 days to respond to Awan's motion and that the Court direct the clerk's office provide a copy of the warrant to the government.

Respectfully submitted,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Michael R. Maffei  
Michael R. Maffei  
Assistant U.S. Attorney  
(631) 715-7890

cc: Khalid Awan (by mail)  
305 Saguenay Avenue  
Apartment 2  
Oshawa, Ontario L1J2M9, Canada

Applications GRANTED.  
Government response due 5/28/2020.  
Reply due 6/11/2020. The Clerk of  
Court shall provide the requested  
sealed document [1] to the Government.

SO ORDERED:	
/s/	JOANNA SEYBERT
Joanna Seybert, USDJ	
Dated: 2/21/2020	
Central Islip, NY	

The Clerk of Court shall mail a copy of this  
order to Mr. Awan.